## IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE NASHVILLE DIVISION

CAITLIN O'CONNOR,	)
Plaintiff,	) No. 3:20-cv-00628
v.	) ) Judge Eli J. Richardson )
THE LAMPO GROUP, LLC a/k/a RAMSEY SOLUTIONS,	) ) Magistrate Judge Frensley ) Jury Demand
Defendant.	)

## PLAINTIFF'S UNOPPOSED FIRST MOTION TO AMEND COMPLAINT

COMES NOW Plaintiff Caitlin O'Connor pursuant to Rule 15(a)(1)(B), (c)(1)(C)(ii) of the Federal Rules of Civil Procedure and Local Rule 15.01 and moves the Court for an order granting Plaintiff leave to amend her Complaint (ECF 1) and file the attached Amended Complaint to add claims that have been administratively exhausted at the EEOC. In particular, 180 days have passed since Ms. O'Connor filed her charge with the EEOC, and a right to sue letter has been requested. Thus, the Amended Complaint adds claims for violations of Title VII of the Civil Rights Act of 1964, 42 U.S.C. §§ 2000e *et seq.* ("Title VII"), discrimination on the basis of sex/pregnancy, religion and retaliation; and for violations of the Americans with Disabilities Act 42 U.S.C. §§ 12101 *et. seq.* ("ADA"), as amended by the ADA Amendments Act of 2008 ("ADAAA") for disability discrimination and retaliation. Plaintiff's counsel conferred with Defendant's counsel who does not oppose the filing of the Amended Complaint.

WHEREFORE, Plaintiff respectfully requests that the Court grant this motion and direct the attached Amended Complaint be filed.

Respectfully submitted,

s/ Heather Moore Collins

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## **CERTIFICATE OF SERVICE**

I HEREBY certify that a copy of the foregoing has been served via the Court's CM/ECF system this the 5th day of February 2021 to counsel of record:

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